

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION
at DAYTON
Electronically Filed

MARY DONOFRIO)	
individually and on behalf of all)	
other Ohio residents similarly situated,)	Judge Walter H. Rice
)	
Plaintiff,)	Case No.: 3:19-cv-58
)	
)	
v.)	
)	
AUTO-OWNERS (MUTUAL))	
INSURANCE COMPANY)	
)	
Defendant.)	

**PLAINTIFF’S MOTION FOR SERVICE AWARD TO THE CLASS REPRESENTATIVE
AND AWARDS OF ATTORNEYS’ FEES, COSTS, AND EXPENSES TO CLASS
COUNSEL**

Pursuant to Rule 23(e) and (h) and Rule 54(d)(2) of the Federal Rules of Civil Procedure and the Parties’ Settlement Agreement, Plaintiff and Class Representative Mary Donofrio, on behalf of herself and the proposed Settlement Class (“Plaintiff”), respectfully moves the Court in the above-captioned action for an Order granting Plaintiff’s Motion for Service Award to the Class Representative and Awards of Attorneys’ Fees, Costs and Expenses to Class Counsel. Specifically, Plaintiff respectfully moves the Court for the following awards:

1. Attorneys’ fees, litigation costs and expenses to Class Counsel in the amount of \$1,740,000 (or approximately 19.5% of the total benefit made available to the Class and without any reduction in the payments to be made to Class Members); and

2. Service Award to the Class Representative in the amount of \$7,500 for her service to the Settlement Class.

This Motion is based upon the Parties' Settlement Agreement (Dkt. 28-1) and supporting documents, and the entire files and proceedings herein. For the reasons set forth in the accompanying Memorandum and accompanying Declarations of Class Counsel, Plaintiff respectfully requests that the Court grant this Motion.

Respectfully submitted,

/s/ Stephen G. Whetstone
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was filed and served via the Court's ECF filing system which will send electronic notices of same to all counsel of record on this the 27th day of June, 2022.

/s/ Stephen G. Whetstone